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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

MATTHEW GREGORY VANNOZZI, an
individual,

Plaintiff,

vs.

CLARK COUNTY, ex. rel., CLARK
COUNTY FIRE DEPARTMENT, a political
subdivision of the State of Nevada; DOES I
through X, and each of them, inclusive; ROE
CORPORATIONS I through X, and each of
them, inclusive,

Defendants.

Civil Case No.: 2:25-cv-00344-JAD-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND
TO DEFENDANT'S MOTION TO
DISMISS [ECF NO. 9] AND TO
CONTINUE HEARING DATE
(FIRST REQUESTED EXTENSION)**

ECF No. 11

Plaintiff MATTHEW GREGORY VANNOZZI ("Plaintiff") and CLARK COUNTY, ex. rel., CLARK COUNTY FIRE DEPARTMENT ("Defendant" and collectively the "Parties"), by and through their respective, undersigned, attorneys of record, hereby stipulate and agree to the following regarding Defendant's Motion to Dismiss [ECF No. 9], filed on June 11, 2025. This is the first requested extension of time for Plaintiff to respond to Defendant's Motion to Dismiss [ECF No. 9]:

1. On June 11, 2025, Defendant filed its Motion to Dismiss [ECF No. 9];

2. Plaintiff's response to Defendant's Motion to Dismiss is currently due on June 25, 2025;

3. There is an in-person hearing on Defendant's Motion to Dismiss currently scheduled for July 14, 2025.

4. The Parties stipulate and agree that good cause exists to extend the deadline for Plaintiff to respond to Defendant's Motion to Dismiss by fourteen (14) days, making the new deadline July 9, 2025;

5. Good cause exists for this extension because Plaintiff's counsel has a scheduling conflict due to a previously scheduled academic retreat in Vancouver, British Columbia;

6. This is the first request for an extension of time for Plaintiff to respond to Defendant's Motion to Dismiss [ECF No. 9];

7. No party will be prejudiced by this extension;

8. This stipulation is made in good faith and not for purposes of delay;

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INJURY ATTORNEYS

9. The parties further agree to continue the hearing to a later date that is convenient for the Court.

10. If the hearing is set that conflicts with the parties' schedules or this extended briefing schedule, the parties further agree to confer to reschedule to a date mutually agreeable with the parties and the Court; and

11. The Parties stipulate and agree that Plaintiff's new deadline to respond to Defendant's Motion to Dismiss (ECF No. 9) shall be July 9, 2025.

12. The Parties stipulate and agree that the hearing on Defendant's Motion to Dismiss shall be continued to a later date.

IT IS SO STIPULATED.

Respectfully submitted,

DATED June 25, 2025.

OFFICE OF THE DISTRICT
ATTORNEY-CIVIL DIVISION

/s/ Sara I. Schreiber

STEVEN B. WOLFSON, ESQ

Nevada Bar No. 001565

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500 S. Grand Central Pkwy

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Attorneys for Defendant

DATED June 25, 2025.

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/s/ Jason D. Guinasso

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Counsel for Plaintiff

IT IS SO ORDERED. The hearing on the motion to dismiss [9] is continued to the August 11, 2025, 2 p.m. civil-motion hearing stack.


UNITED STATES DISTRICT JUDGE

DATED: 6/27/25.